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October 18, 2020

Hon. Katherine Polk Failla
United States District Court
Southern District of New York
Court Room 610
40 Foley Square
New York, NY 10007

Re : Abraham v Leigh
Case No. : 17-cv-5429 (KPF)

To the Honorable Judge Failla:

I am former counsel for Plaintiff, of counsel to Wiss & Partners at all relevant times. We are an Interested Party in the ancillary action for Breach of Contract and Conditional Contempt. This involves the breach of the court-ordered 'Peace Clause' which resolved our Motion to Withdraw as Plaintiff's counsel.

For the record we respectfully oppose Plaintiff's letter motion of October 16, 2020 (DKT. # 577), already denied by your Honor, for a continuance of the October 19, 2020 pre-motion conference. Despite Plaintiff's representation in her October 16, 2019, about which she did not ask us, we would be prejudiced by delay because of the continuation of the perplexing campaigns Plaintiff has launched against us in multiple fora. It is noteworthy that Plaintiff's latest statements on the public docket in Dkt. # 577) are again false, unsupported by the evidence or misleading. Specifically, while the undersigned is an activist against the strategic use of 'Custody by 911' in the family courts, I have no record of arrest per *Connecticut's Erasure Statute CGS 54-142a*. While I removed a case from Family Court to Federal Court for immigration and Constitutional questions which was remanded, the Honorable Judge Shea was one of the Federal judges in Connecticut who took out a full page advertisement in the Law Journal to thank the undersigned, among others, for having "exemplified the finest traditions of the bar by providing effective representation, pro bono, to indigent persons with matters before the Court." Furthermore, in my activism, or otherwise, I did not ask Plaintiff for any medical records from her long ago cases in Florida and indeed rejected her efforts to involve me in a chain of custody of those alleged records. Similarly, neither Ms. Wiss nor I had anything to do with the alleged racketeering and alleged indictments in which Plaintiff says she and the Florida Middle District assistant U.S. attorney drafted in Plaintiff's child custody case in 1997. While the timeline and connections Plaintiff asserts through false conjecture are puzzling and convoluted, neither Ms. Wiss nor I had or have any involvement with these long passed actions. Similarly Plaintiff's repeated false narrative that we provided false information to the court that is fully documented is false and wholly undocumented.

We would ask that Plaintiff's October 16, 2020 second request to delay (Dkt/ #577) the October 19, 2020 hearing and this opposition be sealed as Dkt. # 577 contains false allegations, which are not relevant or probative to the issues in the case.

Respectfully submitted,



By Colleen Ni Chairmhaic, Esq.

cc Robyn Abraham

Application GRANTED. Due to the sensitive nature of information contained therein the Clerk of Court is directed to seal docket entries 576 and 577, to be viewable to the Court and parties only.

Dated: October 19, 2020
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE